



December 27th, 2010

Honorable Sean Lane
United States Bankruptcy Court
Southern District of New York
One Bowling Green, Room 708
New York, NY 10004-1408

Re- ASK Financial Request for Default Judgment
BK. No.08-10152-JMP

To Whom It May Concern:

We were a creditor in the Quebecor World Bankruptcy filing. (Case No 08-10152-jmp.

We received correspondence from ASK Financial paralegal Andrew Thibodeau in March of 2010 re a case filed by the same against us and all other creditors in Quebecor World bankruptcy proceedings.

ASK Financial had sent original correspondence to an old office address we had not occupied since July, 2005. Obviously mail forwarding for this address had expired. We found out about this action by returning a phone call to Mr. Thibodeau who informed us the suit had been filed and provided us a copy in March of 2010. We responded to the court at that time.

We had no knowledge of the original filing of this case in January of 2010, seeking to reclaim money we received as payments from Quebecor World during the "Preference Period" between October 23, 2007 and January 21, 2008. We were a Staffing and Recruitment agency providing employees to Quebecor World during this period. We had been given a heads up by World Color (successor to QW) that "blanket law suits" like this were likely.

We provided these staffing and placement services for Quebecor World and had to pay our employees for work done for Quebecor. Quebecor World was invoiced and paid us for those Staffing services. At the time of their Chapter 11 filing, they were in arrears to us for approximately \$138,000. Essentially this put us out of business. We had to lay off our employees, liquidate office furnishings and equipment and break our office lease with our landlord.

We provided ASK Financial with all corresponding invoices and offered to provide all e-mail correspondence with Quebecor World officers and employees involved in hiring us and paying for our services. The paralegal involved did not seem to comprehend how a "staffing agency" works. All of our correspondence was answered by either "spreadsheets" detailing how long it to Quebecor World to pay us or offers to settle. Settle with what? Their bankruptcy took us down!

I explained to the paralegal that we could not afford an attorney as the entity had no funds and that we would be happy to provide all supporting documentation of our work for Quebecor World, payments to employees, invoices etc. Again, I do not think the paralegal (Mr. Thibodeau) involved comprehended how the "staffing industry" works, nor was their any attempt to "try to understand". He was obviously under pressure to collect as much as possible regardless of the validity of the claim.

We have detailed funds received from Quebecor during this period with ASK, when the work was invoiced and when we received payment. When Quebecor filed for reorganization, we were owed an additional \$138,000.00 by the company.

Quebecor was consistently **very late** in their payments to us pre-filing causing us extreme cash flow issues. We had to call Montreal accounting and our buyers weekly. Our average aging on "paid" Quebecor World invoices in 2007 was 133 days. Normal for our business is 45 days. Our contract with QW called for 30 days.

We respectfully request that you vacate this judgment or allow us to present all of our corroborating information to the court.

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Cc:

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